

UNITED STATES DISTRICT COURT
for the
Eastern District of New York

DORINA SOKOLOVSKY

Plaintiff

v.

OORAH, INC. OORAH CASTKILL RETREAT LLC
a/k/a "THE ZONE"; and GITTIE SHEINKOPF,

Defendant

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Civil Action No. 20-CV-04116(DG)(CLP)

SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To:

ASHER LOVY

(Name of person to whom this subpoena is directed)

Testimony: YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization, you must promptly confer in good faith with the party serving this subpoena about the following matters, or those set forth in an attachment, and you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about these matters:

Place: VIRTUAL

Date and Time:

3/26/2024 @ 10:00 am

The deposition will be recorded by this method: REMOTE - via ZOOM or other such platform and videotaped.

Production: You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material: All documents in your possession that fall within the scope of documents and things described in the enumerated requests set forth in Exhibit "A" attached hereto.

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 3/8/2024

CLERK OF COURT

OR

Carla Varriale-Barker

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* Defendants
Oorah, Inc. and Oorah Catskill Retreat, LLC aka "The Zone" , who issues or requests this subpoena, are:
Carla Varriale-Barker, Esq. - Segal McCambridge, 777 Third Ave., Ste 2400, NY, NY 10017, cvarriale@smmsm.com

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

EXHIBIT "A"

TO SUBPOENA TO TESTIFY AT VIDEO DEPOSITION OF NON-PARTY WITNESS

ASHER LOVY

The deponent (or the deponent's representative) is also required to bring the following documents, electronically stored information, or objects, and permit inspection, copying, testing, or sampling of the following materials:

1. A copy of Deponent's current driver's license.
2. Copies of your social media posts, including on behalf of Zaa'kah, regarding Plaintiff's claims made regarding the Oorah Defendants or Gittie Sheinkopf or this lawsuit;
3. Copies of written or electronic materials such as journals, correspondence, voice mails, voice notes and social media posts provided to you regarding Plaintiff's claims regarding the Oorah Defendants or Gittie Sheinkopf and this lawsuit;
4. Copies of your or Zaa'kah's communications including direct messages, texts, social media posts regarding Gittie Sheinkopf's fundraiser to defray her legal expenses;
5. Communications including correspondence, direct messages, videos, recordings, audio, text messages, podcasts, voice notes and social media posts with or about Plaintiff Leah Sokolovsky regarding the Oorah Defendants or Gittie Sheinkopf from 2011 to the present;
6. Communications including correspondence, direct messages, videos, recordings, audio, text messages, podcasts, voice notes and social media posts with or about Leah Forster regarding the Oorah Defendants or Gittie Sheinkopf from 2011 to the present;
7. Communications including correspondence, direct messages, videos, recordings, audio, text messages, podcasts, voice notes and social media posts with attorneys representing Plaintiff Leah Sokolovsky regarding the claims in this lawsuit, the Oorah Defendants or Gittie Sheinkopf from 2011 to the present;
8. Communications whether electronic, through social media or written with any campers and staff who attended camps operated by the Oorah Defendants from 2011 to present.
9. All communication and/or correspondence between you and third-parties, including but not limited, media outlets, or any other organizations, through letters, text messages, WhatsApp, emails, journal entries, direct social media messages, public or private posts on social media accounts, transcripts of telephone conversations, or any other means regarding the Plaintiff, the alleged abuse perpetrated by co-defendant Gittie Sheinkopf, or about the Oorah Defendants named in this lawsuit.